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May 24, 1985

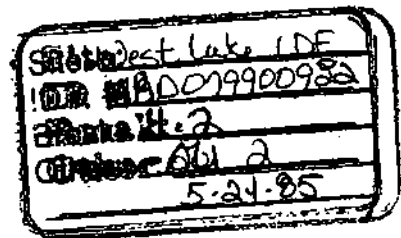
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MAY 28 1985

MANAGEMENT PROGRAM

David E. Bedan, Ph.D.
Director
Waste Management Program
Missouri Department of Natural Resources
P.O. Box 1368
Jefferson City, Missouri 65102

Re: Westlake Landfill, Inc.
Application for Operating Permit
St. Louis County



Dear Dr. Bedan:

Receipt of your letter dated May 21, 1985 is hereby acknowledged. Thank you for responding so promptly following our meeting on May 20, 1985.

The Board of Directors of Westlake Landfill, Inc. met on May 23, 1985 to discuss your letter and I have had the opportunity to review your letter with Mr. Robert Robinson of Burns & McDonnell. Westlake Landfill intends to take the following steps to address the points you raised in your letter:

1. Westlake Landfill recognizes its obligation to establish an escrow fund to assure that funds are available for leachate collection and treatment. (We call your attention to paragraph 5.b. of Mr. Robinson's letter dated March 14, 1985 addressing this requirement.) The Board of Directors has requested that Burns & McDonnell proceed immediately with the following:

a. Prepare the necessary engineering report and plans to address the potential infiltration of leachate from the previously filled areas and of ground water from the northeast wall of the proposed area.

b. Prepare a detailed estimate of costs associated with implementing the results of such engineering reports and plans (post-closure maintenance).

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SUPERFUND RECORDS

DNR 0182

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Following the receipt of the above from Burns & McDonnell-- which we estimate should be no later than June 6, 1985--the Board will assess this information and submit a detailed engineering plan to DNR together with a proposed escrow agreement.

2. An existing leachate collection point currently exists in each of the previously filled quarries. In addition, Westlake Landfill agrees to construct another leachate collection point (observation well) in order to provide additional collection and monitoring for the previously filled 7.5 acre quarry. The location of this well will be identified in the material we submit to you at the time we respond to point #1 above.

3. Westlake Landfill agrees to provide a positive draining interface along the quarry wall above elevation 400 (MSL). The design for this interface will be provided at the same time the information is provided respecting the foregoing two answers.

4. Westlake Landfill agrees to remove final cover from old fill areas which are to be covered with additional waste.

5. Westlake Landfill agrees to provide an all-weather rock road to allow access to the working face.

6. Burns & McDonnell's geotechnical engineer is gathering soil samples this week. Details concerning the suitability of the soils to be used to construct the designated soil pads will be provided in the report due from Burns & McDonnell.

7. Westlake Landfill is preparing a detailed inventory of substitute equipment owned by it which would be available in case of equipment failure. In addition, we will be obtaining assurances from major equipment suppliers in the St. Louis area that such equipment is readily available in case it is needed.

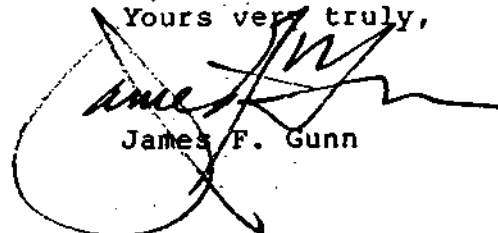
8. Westlake Landfill has instructed Burns & McDonnell to commence preparation of the operating manual you described in your letter. Westlake Landfill agrees to provide this manual to DNR when the manual is finally completed and to also make such operating manual available to all present and future employees of the landfill. The Board wants this manual to be comprehensive and it should be available not too long after the permit is issued.

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9. our next report to you will include revisions which reflect all of the above changes and incorporating other changes made during the permit process.

Dr. Bedan, in our meeting last Monday I expressed our Board's concerns about obtaining the permit in an expeditious manner. We sincerely appreciate your cooperation and we will be back to you promptly. We trust that your formal comment letter will be forthcoming within the next several days since we want to make sure that our next response is sufficiently comprehensive to allow the permit to be issued.

Yours very truly,

A handwritten signature in dark ink, appearing to read "James F. Gunn", is written over a large, loopy circular flourish.

James F. Gunn

JFG:ms

cc: Mr. Robert Robinson
Burns & McDonnell